

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

JOHN F. HANSON, JR.  
and JOHN F. HANSON,  
DMD, P.C.,

Plaintiffs,

v.

ORTHALLIANCE INC.,  
a Delaware corporation,

Defendant.

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Civil Action No. 3:04-CV-30045-MAP

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**JOINT EMERGENCY MOTION TO STAY PROCEEDINGS**

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Plaintiffs John F. Hanson, Jr. and John F. Hanson D.M.D., P.C. (“Plaintiffs”) and Defendant OrthAlliance, Inc., (“OrthAlliance”) respectfully file the following Joint Emergency Motion to Stay Proceedings:

**I.**

On March 28, 2005, OrthAlliance and a group of doctors from across the nation asserting claims similar to those before this court met for settlement discussions guided by United States District Judge Philip P. Simon of the Northern District of Indiana. At the conclusion of this meeting, OrthAlliance and the doctors, including those before this Court, agreed to a proposed settlement that is subject to final approval by the doctors. The settlement, if implemented, will resolve this litigation.

**II.**

Given that there are approximately 60 doctors involved in the settlement, obtaining the doctors’ final approval of the settlement and completing the final settlement papers will take time. The parties have agreed to complete these matters within 60 days.

In light of the proposed settlement, the parties jointly request this Court to stay all proceedings in this matter for 60 days, until May 31, 2005, to afford the parties sufficient time to complete settlement papers.

Respectfully submitted,

/s/ Nolan C. Knight (with permission)

John R. Gobel, BBO No. 196340  
GOBEL & HOLLISTER  
106 Wendell Avenue  
Pittsfield, Massachusetts 01201  
Telephone: (413) 443-7337  
Facsimile: (413) 499-2981

Roger B. Cowie – *pro hac vice*  
Texas Bar No. 00783886  
Nolan C. Knight – *pro hac vice*  
Texas Bar No. 24027125  
Abigail B. Moore – *pro hac vice*  
Texas State Bar No. 24037133  
LOCKE LIDDELL & SAPP LLP  
2200 Ross Avenue, Suite 2200  
Dallas, TX 75201  
Telephone: (214) 740-8000  
Facsimile: (214) 740-8800

COUNSEL FOR PLAINTIFFS

/s/ Robert H. Espey, II

Robert Aronson  
Law Offices of Robert Aronson  
101 State Street  
Springfield, Massachusetts 01103  
Telephone: (413) 733-2600  
Facsimile: (413) 737-4318

Scott M. Clearman – *pro hac vice*  
Texas State Bar No. 04350090  
Robert H. Espey, III v—*pro hac vice*  
Texas State Bar No. 24007163  
McClanahan & Clearman, LLP  
4100 Bank of America Center  
700 Louisiana  
Houston, Texas 77002  
Telephone: (713) 223-2005  
Facsimile: (713) 223-3664

COUNSEL FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served by electronic filing or U.S. Mail on this 1<sup>ST</sup> day of April 2005 to the following counsel of record:

John R. Gobel  
GOBEL & HOLLISTER  
106 Wendell Avenue  
Pittsfield, Massachusetts 01201

Roger B. Cowie  
Nolan C. Knight  
Abigail B. Moore  
LOCKE LIDDELL & SAPP LLP  
2200 Ross Avenue, Suite 2200  
Dallas, TX 75201

/s/ Robert H. Espey, II  
Robert H. Espey, II